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Manager, Government Relations

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MAR 06 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 6, 2000

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

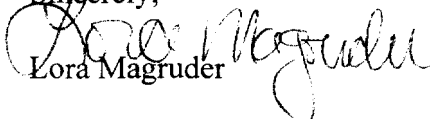
Re: **Ex Parte Notice:** CC Docket No. 95-116; CCB/CPD 99-9.
In the Matter of Local Number Portability; Joint Petition for
Expedited Interim Waiver of Section 52.33(a) of the
Commission's Rules.

Dear Ms. Salas:

On March 3, 2000, representatives of the National Exchange Carrier Association, Inc. (NECA) met with members of the Commission's Competitive Pricing Division (CPD) to discuss the results of a local number portability (LNP) data request (attached). NECA attendees were Pat Chirico, Executive Director - Rates, Costs and Average Schedules; Bill Cook, Director - Access Tariffs; Bill Campbell, Director; and Gina Harrison, Senior Counsel and Director - Washington Office. CPD participants were Judith Nitsche, Chief - Tariff and Pricing Analysis Branch; Lenworth Smith, Chief - Legal Branch; Josephine Scarlett, Attorney Advisor; and Eugene Gold, Analyst.

In accordance with Commission rules, I am submitting two copies of this notice. Kindly stamp the additional return copy provided. Please direct any questions to me.

Sincerely,


Lora Magruder

Attachment

CC: Judith Nitsche, CPD
Lenworth Smith, CPD
Gene Gold, CPD
Josephine Scarlett, CPD

No. of Copies rec'd 012
List A B C D E

LNP Data Request

- Issued on January 18, 2000
- LECs were to reply by February 14
- 75% of TS Pooling LECs replied representing 77% of the total access lines.
- Costs are divided into three key components:
 - Database Administration
 - One-time true-up and monthly costs.
 - Software Upgrade costs
 - Query costs
- All data is still preliminary and subject to review.

LNP Data Request Database Administration

- 732 LECs reported Database Administration charges
- Average cost per line is 0.6 cents
- Charges reported by over 700 LECs range up to 11 cents per line per month
- True-up may add one more cent per month
- Total annualized costs are about \$370 thousand.

LNP Data Request

Software Costs

- About 135 LECs indicated direct costs related to LNP Query initiation & transport software.
- Costs for the 135 LECs average 12 cents per line per month.
- Staff is still analyzing outliers.
- One time costs that will be amortized over five years total about \$5 million.

LNP Data Request

Query Costs

- Query charges averaged about 4.6 cents per line per month for those LECs reporting costs.
 - About 135 LECs representing 25% of pool's access lines indicated they had received bills for queries.
 - Cost per line per month range from near zero to about 20 cents.
- Annualized Query costs for the 135 LECs represent \$830 thousand for pool.
- Over 30% of pooling LECs have not yet received bills, especially in Alaska and areas served by US West, Pacific Telesis, and Bell Atlantic - North. Estimated annualized query expenses for these 500 LECs are \$482 thousand.

LNP Data Request Summary

- Total annual costs are estimated at \$2.7 million
- Development of EC specific tariff rates for a dollar amount representing only 0.13 percent of the interstate access revenue creates an administrative burden and customer confusion.
- A more appropriate mechanism would be to permit recovery through the Local Switching rates which would increase this rate by only \$0.000160 per minute.